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April 3, 2020

Via Electronic Filing

The Honorable Judge Gabriel W. Gorenstein
U.S. District Court Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *De La Rosa v. Aspenly Co. LLC et al*,
Case No.: 1:18-cv-03456

Dear Honorable Judge Gorenstein:

This law firm represents Defendant Pure Green NYC 8th Street Corp (the “**Defendant**”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules 1(A) and (E), this letter respectfully serves to supplement Defendant’s April 3, 2020 letter motion [Dckt. No. 99].

Plaintiff’s counsel has consented to Defendant’s request for an extension of the fact discovery deadline. Assuming the current COVID-19 pandemic has been resolved, Defendant, on consent of Plaintiff’s counsel, requests until July 15, 2020 to complete remaining fact discovery, with expert discovery to close on August 15, 2020.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel